

EXHIBIT B

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Todd A. Harding (Ga. Bar No.: 101562) Harding Law Firm, LLC 113 East Solomon Street Griffin, GA 30223 TELEPHONE NO.: (770) 229-4578 FAX NO.: (770) 228-9111 E-MAIL ADDRESS: ATTORNEY FOR (Name): Dr. Paul C. Broun, Sheri Gilligan, and Voterga		SUBP-035 FOR COURT USE ONLY
Court for county in which discovery is to be conducted: SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES STREET ADDRESS: 111 North Hill Street MAILING ADDRESS: 111 North Hill Street CITY, STATE, AND ZIP CODE: Los Angeles, CA 90012 BRANCH NAME: Stanley Mosk Courthouse		
Court in which action is pending: Name of Court: SUPERIOR COURT OF FULTON COUNTY, STATE OF GEORGIA STREET ADDRESS: 136 Pryor Street, Suite C155 MAILING ADDRESS: 136 Pryor Street, Suite C155 CITY, STATE, AND ZIP CODE: Atlanta, GA 30303 COUNTRY: United States of America		
PLAINTIFF/PETITIONER: Dr. Paul C. Broun, Sheri Gilligan, and Voterga DEFENDANT/RESPONDENT: State of Georgia		CALIFORNIA CASE NUMBER (if any assigned by court)
SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS IN ACTION PENDING OUTSIDE CALIFORNIA		CASE NUMBER (of action pending outside California): 2022CV361918

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of deponent, if known):
 Los Angeles County District Attorney's Office, Custodian of Records and Evidence, 211 W. Temple St., Ste. 1200, Los Angeles, 90012

1. YOU ARE ORDERED TO PRODUCE THE BUSINESS RECORDS described in item 3, as follows:

To (name of deposition officer): Michel & Associates, P.C.	
On (date): January 3, 2023	At (time): 9:00 A.M.
Location (address): 180 East Ocean Blvd., Suite 200, Long Beach, CA 90802	
Do not release the requested records to the deposition officer prior to the date and time stated above.	

- a. ☐ by delivering a true, legible, and durable copy of the business records described in item 3, enclosed in a sealed inner wrapper with the title and number of the action, name of witness, and date of subpoena clearly written on it. The inner wrapper shall then be enclosed in an outer envelope or wrapper, sealed, and mailed to the deposition officer at the address in item 1.
- b. ☒ by delivering a true, legible, and durable copy of the business records described in item 3 to the deposition officer at the witness's address, on receipt of payment in cash or by check of the reasonable costs of preparing the copy, as determined under Evidence Code section 1563(b).
- c. ☐ by making the original business records described in item 3 available for inspection at your business address by the attorney's representative and permitting copying at your business address under reasonable conditions during normal business hours.
2. The records are to be produced by the date and time shown in item 1 (but not sooner than 20 days after the issuance of the deposition subpoena, or 15 days after service, whichever date is later). Reasonable costs of locating records, making them available or copying them, and postage, if any, are recoverable as set forth in Evidence Code section 1563(b). The records must be accompanied by an affidavit of the custodian or other qualified witness pursuant to Evidence Code section 1561.
3. The records to be produced are described as follows (if electronically stored information is demanded, the form or forms in which each type of information is to be produced may be specified):
 See Attachment.
- ☒ Continued on Attachment 3 (use form MC-025).
4. Attorneys of record in this action or parties without attorneys are (name, address, telephone number, and name of party represented): See Attachment.

☒ Continued on Attachment 4 (use form MC-025).

SUBP-035

PLAINTIFF/PETITIONER: Dr. Paul C. Broun, Sheri Gilligan, and Voterga
 DEFENDANT/RESPONDENT: State of Georgia

CASE NUMBER (of action pending outside California):
 2022CV361918

5. If you have been served with this subpoena as a custodian of consumer or employee records under Code of Civil Procedure section 1985.6 and a motion to quash or an objection has been served on you, a court order or agreement of the parties, witnesses, and consumer or employee affected must be obtained before you are required to produce consumer or employee records.
6. ☐ Other terms or provisions from out-of-state subpoena, if any (specify):

☐ Continued on Attachment 6 (use form MC-025).

DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF \$500 AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.

Date issued:

DEC 08 2022

CRISTINAGRIJALVA
 (TYPE OR PRINT NAME)



Cristina Grijalva
 (SIGNATURE OF PERSON ISSUING SUBPOENA)

CSA III
 (TITLE)

**PROOF OF SERVICE OF SUBPOENA FOR
 PRODUCTION OF BUSINESS RECORDS**

1. I served this Subpoena for Production of Business Records In Action Pending Outside California by personally delivering a copy to the person served as follows:
- a. Person served (name):
- b. Address where served:
- c. Date of delivery:
- d. Time of delivery:
- e. Witness fees and mileage both ways (check one):
- (1) ☐ were paid. Amount: \$
- (2) ☐ were not paid.
- (3) ☐ were tendered to the witness's public entity employer as required by Government Code section 68097.2. The amount tendered was (specify): \$
- f. Fee for service: \$
2. I received this subpoena for service on (date):
3. ☐ I also served a completed Proof of Service of Notice to Consumer or Employee and Objection (form SUBP-025) by personally delivering a copy to the person served as described in 1 above.
4. Person serving:
- a. ☐ Not a registered California process server
- b. ☐ California sheriff or marshal
- c. ☐ Registered California process server
- d. ☐ Employee or independent contractor of a registered California process server
- e. ☐ Exempt from registration under Business and Professions Code section 22350(b)
- f. ☐ Registered professional photocopier
- g. ☐ Exempt from registration under Business and Professions Code section 22451
- h. Name, address, telephone number, and, if applicable, county of registration and number:

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date:



(SIGNATURE)

(For California sheriff or marshal use only)
 I certify that the foregoing is true and correct.

Date:



(SIGNATURE)

MC-025

SHORT TITLE:

Dr. Paul C. Broun, et al. v. State of Georgia

CASE NUMBER:

2022CV361918

ATTACHMENT (Number): 3

(This Attachment may be used with any Judicial Council form.)

The records to be produced are described as follows: any and all hardware, equipment, software, files, images, firmware, configurations, electronically stored data or information, and any other materials or copies of seized items from Konnech, Inc. pursuant to a search warrant executed in the State of Michigan, or otherwise gathered in relation to Case No. BA509784, People of the State of California v. 01 Eugene Wei Yu (Dob: 11/01/1957).

MC-025

SHORT TITLE: Dr. Paul C. Broun, et al. v. State of Georgia	CASE NUMBER: 2022CV361918
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ATTACHMENT (Number): 4

(This Attachment may be used with any Judicial Council form.)

Attorneys of record in this action or parties without attorneys are:

Attorneys for Petitioners Dr. Paul C. Broun, Sheri Gilligan, and Voterga
 Todd A. Harding
 Harding Law Firm, LLC
 113 East Solomon Street
 Griffin, GA 30223
 Tel. No.: (770) 229-4578
 Fax No.: (770) 228-9111

Attorneys for Respondent State of Georgia
 Elizabeth Vaughan
 Office of the Georgia Attorney General
 40 Capitol Square
 Atlanta, GA 30334
 Tel. No.: (404) 651-8600

(If the item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.)

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(Add pages as required)